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Attorneys for Plaintiffs

L.C., I.H., A.L., and Antonia Salas Ubaldo

**UNITED STATES DISTRICT COURT FOR THE  
CENTRAL DISTRICT OF CALIFORNIA**

L.C., a minor by and through her  
guardian *ad litem* Maria Cadena,  
individually and as successor-in-interest  
to Hector Puga; I.H., a minor by and  
through his guardian *ad litem* Jasmine  
Hernandez, individually and as  
successor-in-interest to Hector Puga;  
A.L., a minor by and through her  
guardian *ad litem* Lydia Lopez,  
individually and as successor-in-interest  
to Hector Puga; and ANTONIA SALAS  
UBALDO, individually;

Plaintiffs,

vs.

STATE OF CALIFORNIA; COUNTY  
OF SAN BERNARDINO; S.S.C., a  
nominal defendant; ISAIAH KEE;  
MICHAEL BLACKWOOD;  
BERNARDO RUBALCAVA; ROBERT  
VACCARI; JAKE ADAMS; and DOES  
6-10, inclusive,

Defendants.

Case No. 5:22-cv-00949-KK-SHK

*Honorable Kenly Kiya Kato*

**DECLARATION OF LINDA  
RANGEL IN SUPPORT OF  
NOMINAL DEFENDANT S.S.C'S EX  
PARTE APPLICATION FOR  
APPROVAL OF COMPROMISE OF  
MINOR PLAINTIFFS AND MINOR  
NOMINAL DEFENDANT'S CLAIMS**

**DECLARATION OF LINDA RANGEL**

I, Linda Rangel, hereby declare as follows:

1. I am the natural mother and legal guardian of Nominal Defendant S.S.C. in the above-referenced case. I have personal knowledge of the matters stated herein and could testify competently thereto if called upon to do so. I make this declaration in support of Nominal Defendant S.S.C's Ex Parte Application for Approval of Compromise of Minor Plaintiffs' and Minor Nominal Defendant's Claims.

2. The decedent is Hector Puga.

3. Hector Puga died on February 17, 2021 in Hesperia, California.

4. No proceeding is now pending in California for the administration of decedent's estate.

5. S.S.C. is the decedent's child and successor in interest (as defined in Section 377.11 of the California Code of Civil Procedure) and succeeds the decedent's interest in the action or proceeding.

6. I am the natural mother and legal guardian of S.S.C. and therefore am authorized to act on behalf of S.S.C. in her capacity as decedent's successor in interest.

7. I have no adverse interest to S.S.C. as it relates to this pending action or proceeding and am able to adequately represent S.S.C's interests in this action.

8. No other person has a superior right to commence the action or proceeding or to be substituted for the decedent in the pending action or proceeding.

9. A copy of the decedent's death certificate is attached hereto as Exhibit "F."

10. I have reviewed the Application for Approval of Compromise of Minor Plaintiffs' and Minor Nominal Defendant's Claims and am in agreement with the contents of the Application and the selection of the annuity plan for Nominal Defendant S.S.C.

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I declare under penalty of perjury pursuant to the laws of the United States of

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America that the foregoing is true and correct, and that this declaration was executed

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this 7/15/2025 in Los Angeles, California.

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Signed by:



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Linda Rangel

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